

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

BIO-RAD LABORATORIES, INC., THE)	
UNIVERSITY OF CHICAGO, LAWRENCE)	
LIVERMORE NATIONAL SECURITY)	
LLC, and PRESIDENT AND FELLOWS OF)	
HARVARD COLLEGE,)	C.A. No. 20-cv-506-RGA
)	
Plaintiffs,)	
)	
v.)	
)	
DROPWORKS, INC.)	
Defendant.)	

STIPULATION AND [PROPOSED] ORDER AMENDING CERTAIN DEADLINES

WHEREAS, Plaintiffs Bio-Rad Laboratories, Inc., The University of Chicago, Lawrence Livermore National Security LLC, and President and Fellows of Harvard College and Defendant Dropworks, Inc. require additional time to complete fact discovery;

WHEREAS, the parties have agreed, subject to the Court's approval, to extend certain case deadlines without altering those deadlines that affect the Court, including the deadlines for dispositive motions, the pre-trial conference, or trial;

NOW, THEREFORE, pursuant to Federal Rule of Civil Procedure 16(b)(4), the parties hereby stipulate to amend the deadlines set forth in the Court's March 16, 2021 Order (D.I. 76) in the above-captioned matter as follows:

No.	Event	Current Schedule	Proposed Amended Schedule
1	Fact discovery cut off (D.I. 22, ¶ 3.a)	Fri., Nov. 12, 2021	Fri., Dec. 10, 2021
2	Last day to disclose expert testimony under Rule 26(a)(2) (D.I. 22, ¶ 10.a)	Fri., Dec. 17, 2021	Wed., Jan. 12, 2022

No.	Event	Current Schedule	Proposed Amended Schedule
3	Last day to serve supplemental disclosure to contradict or rebut evidence on the same matter identified by another party (D.I. 22, ¶ 10.a)	Mon., Jan. 24, 2022	Fri., Feb. 4, 2022
4	Last day to serve reply expert reports (D.I. 22, ¶ 10.a)	Wed., Feb. 23, 2022	Mon., Feb. 28, 2022
5	Last day to complete expert depositions (D.I. 22, ¶ 10.a)	Fri., Mar. 25, 2022	Thu., Mar. 31, 2022

Dated: September 28, 2021

Respectfully submitted,

FARNAN LLP

RICHARDS, LAYTON & FINGER, P.A.

/s/ Brian E. Farnan

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Attorneys for Defendant

IT IS SO ORDERED this ____ day of September, 2021.

The Honorable Richard G Andrews